

SIEMENS

PATENT
Attorney Docket No. 2003P00251WOUS

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

Inventor:	C. Scheering et al.)	Confirmation No:	1353
)		
Serial No.:	10/529,405)	Examiner:	J. Park
)		
Filed:	March 29, 2005)	Group Art Unit:	2454
Title	METHOD AND ARRANGEMENT FOR CONFIGURING A DEVICE IN A DATA NETWORK			

Commissioner For Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

APPELANTS BRIEF

This Appeal Brief relates to an appeal from the rejection of claims 17, 18, 20, 26-28, 30, 31, 33-34 and 48-50 in the Office Action mailed January 23, 2009.

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I. Real Party in Interest

The real party in interest is Siemens Aktiengesellschaft of Munich, Germany, the assignee of record.

II. Related Appeals and Interferences

There are no known related appeals or interferences.

III. Status of Claims

Claims 1-16, 19, 21-25, 29, 32, 45-47 have been canceled. Claims 17, 18, 20, 26-28, 30, 31, 33-44 and 48-50 are rejected. No claims have been allowed. Claims 17, 18, 20, 26-28, 30, 31, 33-44 and 48-50 are being appealed.

IV. Status of Amendments

No amendment has been filed subsequent to the rejection.

V. Summary of Claimed Subject Matter

A. Claim 17

Referring to the FIG 1 and FIG 2, independent claim 17 recites a method for configuring a device (EG) in a data network (LAN), the data network (LAN) comprising an address server (DNS), one or more devices requiring configuration, and one or more parameter servers (ADS), comprising [0014]:

storing a domain name (dev1.domain.country) for a device (EG) in the device (EG) [0014];

storing in an address server (DNS) on the data network (LAN) a data record comprising an IP address of a particular parameter server of the one or more parameter servers, wherein the particular parameter server (ADS) is associated with the domain name (dev.domain.country) [0019];

transmitting a request message (b) from the device (EG) to the address server DNS, wherein the request message (b) includes the domain name (dev1.domain.country) [0036];

ascertaining by the address server (DNS) the data record associated with the domain name (dev1.domain.country) in the received message (b) [0036];

receiving a response message (c) from the address server (DNS) by the device (EG), the response message (c) comprising the IP address of the particular parameter server (ADS) associated with the domain name (dev1.domain.country) from the data record [0036];

setting up a connection to the particular parameter server by the device (EG), the device (EG) using the IP address of the particular parameter server extracted from the response message to set up the connection [0037]; and

receiving parameters (e) by the device (EG) from the particular parameter server (ADS), wherein the parameters are used to configure the device (EG) [0038] [0039].

B. Claim 26

Referring to the FIG 1 and FIG 2, independent claim 26 recites a method for configuring a device (EG) in a data network (LAN), the data network (LAN) comprising an address server (DNS), one or more devices requiring configuration, and one or more parameter servers, the method comprising [0014]:

storing a domain name for a device (EG) in the device (EG) [0014];

storing in an address server (DNS) on the data network (LAN) a data record comprising an IP address of a particular parameter server (ADS) of the one or more parameter servers, wherein the particular parameter server (ADS) is associated with the domain name (dev.domain.country) [0019];

transmitting a first request message (b) to the addressing server (DNS) by the device (EG), the first request message comprising the domain name(dev.domain.country) [0036];

ascertaining by the address server (DNS) the data record associated with the domain name (dev.domain.country) in the received message [0036];

transmitting (b) the IP address of the particular parameter server (ADS) to the device (EG) by the addressing server in response to a receipt of the first request message [0036],

wherein the device (EG) uses the IP address to set up a connection to the particular parameter server (ADS) [0037], and

wherein the particular parameter server (ADS) uses this connection to transmit to the device (EG) parameters which are used to configure the device (EG) [0038] [0039].

C. Claim 30

Referring to the FIG 1 and FIG 2, independent claim 30 recites an arrangement for configuring a device (EG) in a data network (LAN), the data network (LAN) comprising an address server (DNS), one or more devices requiring configuration, and one or more parameter servers, the device (EG) having a memory, the arrangement comprising [0014]:

an addressing server for converting between a domain name of a device (EG) and an Internet protocol (IP) address of a particular parameter server (ADS) comprising the parameters to configure the device (EG);

wherein the device (EG), the addressing server, and the parameter server (ADS) are connected via the data network (LAN), wherein

the device (EG) is designed to:

store a fully-qualified domain name associated with the device (EG) [0006]
[0014], and

transmit a request message (b) to the addressing server, said request message comprising the fully-qualified domain name stored in the device (EG) [0036], wherein

the addressing server (DNS) is designed to:

use the fully-qualified domain name transmitted by the device (EG) to look up a text field associated with the transmitted domain name, the text field having address information of the particular parameter server (ADS), the address information including a port number [0036],

form a response message (c) comprising the looked address information of the particular parameter server (ADS) assigned to the device (EG), the response message transmitted to the device (EG) in response to the request message [0036],

wherein the device (EG) is further designed to connect to the particular parameter server (ADS) based on the response message [0037], and

wherein the particular parameter server (ADS) is adapted to send parameters to the device [0038] [0039] (EG).

VI. Grounds for Rejection to be Reviewed

Claims 17, 20, 26-28, 30, 33-39 and 44 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Golla et al. (US 6,587,874) in view of Haug et al. (US PGPub 2003/0014542),

claims 18, 31 and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Golla in view of Haug, and further in view of Skemer et al. (US 6,570,849),

claims 41-43 and 48 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Golla in view of Haug, and further in view of Choudhry et al. (US 6,442,602), and

claims 49 and 50 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Golla in view of Haug, and Choudhry and further in view of Schneider (US PGPub 2008/005127).

VII. Appellant's Argument

A. The rejection of claims 17, 20, 26-28, 30, 33-39 and 44 under 35 U.S.C. § 103(a) as being obvious over Golla et al. (US 6,587,874) in view of Haug et al. (US PgPub 2003/0014542)

a) Independent claim 17

Applicants' claim 17 recites:

transmitting a request message from the device to the address server, wherein the request message includes the domain name;

The Examiner apparently equates

- Golla's TFTP server 252 as Applicant's address server
- Golla's directory 254 as Applicant's particular parameter server, and
- Golla's TFTP request 264 as Applicant's request message.

Thus, in order to read on Applicant's limitation, Golla's request 264 must include the domain name. In contrast, Golla teaches the TFTP reply 266 includes a domain name, the reply is in response to the request 264 that includes an IP address ("...reply includes a domain name" col. 7 lines 64-65, "The request identifies device 12 by its IP address", col 7 lines 60-61).

Applicants respectfully submit that

[t]he words of the claim must be given their plain meaning unless
**>the plain meaning is inconsistent with< the specification.
...[T]he ordinary and customary meaning of a claim term is the meaning that the term would have to a person of ordinary skill in the art in question at the time of the invention, *i.e.*, as of the effective filing date of the patent application (MPEP2111.01).

Applicant respectfully submits that a reply is in response to a request message and that a person of ordinary skill in the art would not consider a reply as a request message. Thus, a reply including a domain name cannot reasonably be considered Applicant's request including a domain name.

Furthermore, Applicant's claim term "IP address" being a numeric address associated with a layer 3 network protocol and claim term "domain name" being an alphanumeric text are consistent with the ordinary and customary meaning of the terms. A person of ordinary skill in the art would not consider a domain name as an IP address (see also Declaration of Dr. Christian Scheering). Thus, the request message including an **IP address** cannot reasonably be considered Applicant's request including a **domain name**.

Applicants' claim 17 further recites:

receiving a response message from the address server by the device, the response message comprising the IP address of the particular parameter server associated with the domain name from the data record

Since the Examiner has equated the Golla's TFTP server 252 as Applicant's address server, Golla's response message must be from the TFTP. Thus, in order to read on Applicant's limitation, Golla's **response** (reply 266) must include the domain name. However, as previously noted, Golla's response (reply 266) includes a domain name and not an IP address. Also as previously noted a domain name cannot reasonably be considered an IP address and a response (reply 266) cannot reasonably be considered a request.

In view of the above, Applicant respectfully submits that the Examiner has not found all the limitations of claim 17 and that claim 17 is patentable. Furthermore claims 18, 20, 37, 38-40, and 48-50 which depend on claim 17 are also patentable.

b) Independent claim 26

Applicants' claim 26 recites:

transmitting a first request message to the addressing server by the device, the first request message comprising the domain name...transmitting the IP address of the particular parameter server to the device by the addressing server in response to a receipt of the first request message

Applicant respectfully submits that these limitations are similar to the limitations argued in claim 17. In view of the arguments for claim 17, Applicant respectfully submits that claim 26 is patentable. Furthermore claims 27, 28, and 41-44 which depend on claim 26 are also patentable.

c) Independent claim 30

Applicants' claim 30 recites:

the device ...transmit a request message to the addressing server, said request message comprising the fully-qualified domain name stored in the device...the addressing server ...form a response message comprising the looked address information of the particular parameter server assigned to the device, the response message transmitted to the device in response to the request message,

Applicant respectfully submits that these limitations are similar to the limitations argued in claim 17. In view of the arguments for claim 17, Applicant respectfully submits that claim 30 is patentable. Furthermore claims 30, 31, and 33-36 which depend on claim 30 are also patentable.

d) Dependent claim 36

Applicants' claim 36 recites:

In the addressing server is stored the data record with a fictitious domain name which does not belong to a real domain, and wherein the fictitious domain name is simultaneously stored as domain name in the memory of devices in which no domain name for the real domain associated therewith is stored

The Examiner apparently equates

- Golla's local domain name as Applicant's fictitious domain name
- Golla's unique domain name from DNS server as Applicant's real domain, and

However, Applicant is unable to find the terms "local domain name" and "unique domain name" in Golla and thus is uncertain of what the Examiner considers as Golla's local domain name and unique domain name. Based on

- the Examiner's statement "the network device stores the local domain name until DSN server provides the unique domain name based on the IP address of the network device, see, e.g., col. 3 lines 21-27", and
- Golla col. 3 lines 21-27, recites "Knowing its IP address(es), the network device does a DNS query to resolve its name. The DNS query is sent to a DNS server

that maintains a table of bindings (i.e., IP address, hostname). The DNS response to the network device contains the name of the network device, i.e., the 'hostname', and the network device may now be identified by its name",

Applicant has determined that the Examiner considers Golla's IP address as the local domain (fictitious name) and Golla's hostname as the unique domain name (domain name). Applicant respectfully submits that an IP address cannot reasonably be considered as Applicant's fictitious domain name, Applicant's fictitious domain name does not belong to a real domain. In contrast, the IP address is associated to a domain name, specifically the hostname. Therefore, the IP address belongs to a real domain. (The DNS resolves the name of the device based on the IP address of the device (col. 3 lines 21-27). Moreover,

During patent examination, the pending claims must be "given their broadest reasonable interpretation consistent with the specification." (MPEP 2111)

The Patent and Trademark Office ("PTO") determines the scope of claims in patent applications not solely on the basis of the claim language, but upon giving claims their broadest reasonable construction "in light of the specification as it would be interpreted by one of ordinary skill in the art." *In re Am. Acad. of Sci. Tech. Ctr.*, 367 F.3d 1359, 1364[, 70 USPQ2d 1827] (Fed. Cir. 2004).

Applicant respectfully submits that consistent with the specification, a fictitious domain name has the same structure as real domain names but bears no relation to a real domain (see, e.g., [0028]). In contrast, an IP address does not have the same structure as a domain name. For example, an IP address is numeric and a domain name is alphanumeric (see also, Declaration of Dr. Christian Scheering).

In view of the above, an IP address cannot reasonably be considered as fictitious domain name. Thus, Applicant respectfully submits that claim 36 is patentable.

e) Dependent claim 38

Applicants' claim 38 recites:

the domain name is a fictitious domain name which does not belong to a real domain.

Applicant respectfully submits that the Examiner has not provided a proper rejection for claim 38. However, since claim 38 includes a limitation regarding a fictitious domain name, Applicant respectfully submit that the Examiner's rejection would be similar to claim 36. Thus, for the reasons argued above for claim 36, Applicant respectfully submits that claim 38 is patentable.

f) Dependent claim 39

Applicants' claim 39 recites:

both a real domain name and a fictitious domain name are stored in
the device

Applicant respectfully submits that includes a limitation regarding a real domain name fictitious domain name similar to limitations of claim 36. Thus, for the reasons argued above for claim 36, Applicant respectfully submits that claim 39 is patentable.

B. The rejection of claims 41-43 and 48 under 35 U.S.C. § 103(a) as being obvious over Golla in view of Haug and Choudhry (US PgPub 6,442,602)

a) Dependent claim 41

Applicants' claim 41 recites:

the stored domain name is a fictitious domain name which does not belong to a real domain

The Examiner apparently equates

- Choudhry's virtual subdomain name (53 in figure 5) to Applicant's fictitious domain name

Applicant respectfully submits that virtual domain is domain which shares one IP with other virtual domains. Thus, the virtual name does belong to a real domain, whereas, Applicant's fictitious domain name does not belong to a real domain. Applicant respectfully submits that claim 41 is patentable.

b) Dependent claim 42

Applicants' claim 42, which is dependent on claim 41, recites:

storing, in the device, a real domain name with which the device is associated; prior to transmitting the first request message: transmitting a second request message to the addressing server, the second request message comprising the real domain name; and receiving a negative acknowledgement by the device from the addressing server when address information for the parameter server cannot be ascertained in the domain name system server based on the real domain name transmitted in the second request message, wherein the transmission of the first request message with the fictitious domain name to the addressing server is in response to the receipt of the negative acknowledgement message.

Thus, both a real domain name and a fictitious domain name are stored at the device. If a transmitted request comprising the real domain fails (negative acknowledgement) then a request comprising the fictitious domain name is transmitted from the device (see claim 26).

The Examiner apparently equates

- Choudhry's virtual subdomain name (53 in figure 5) to Applicant's fictitious domain name, and
- Choudhry's User 's Browser Machine server as Applicant's device

The Examiner states

a first attempt is used to transmit the request message (41 in figure4) with the real domain name (known domain name, 50 in figure 5) to the addressing server (DNS), if no address information can be ascertained in the addressing server using the domain name transmitted in the first attempt then the addressing server sends a negative acknowledgement message (error 404, 42 in figure 4) to the device as address information (web browser requests URL. If the URL is not recognized by the DNS, the server will return a "error 404:file not found" page to the web browser, see, e.g., col. 6, lines 36-40 and fig 4); and

Applicant respectfully disagrees with the Examiner reading of Choudhry and submits that Choudry does not send the real domain name as asserted by the Examiner but the fictitious domain name (virtual subdomain). According to Choudhry col. 6 lines 36-40 "if a web browser requests a URL such as 'http://subdomain.domain.com', and it is not recognized by the standard DNS, the Apache server will typically return a 'Error 404: File Not Found' page to the web browser". Thus, the domain name sent results in a File Not Found error. However, the Examiner has indicated that the domain name which results in the File Not Found error is fictitious domain name. The Examiner states "Fictitious domain (virtual subdomain name, 53 in figure 5) name does not belong to a real domain (URL is not recognized by the standard DNS is called as the virtual subdomain". Thus, Choudhry does not teach or suggest transmitting a second request message to the addressing server, the second request message comprising the real domain name.

Furthermore, the Examiner states:

a terminal using a second attempt send a further request message with the
fictitious domain name (virtual subdomain name, 53 in figure 5) to the addressing server
(see, e.g., col. 6, lines 58-62 and 53 in figure 5).

Applicant respectfully submits this is the same request that the Examiner refers to as a “first attempt”. The difference being that according to the prior art the File Not Found error would be provided to the web browser and according to Choudhry’s invention the server would redirect the request so that the user would not get the File Not File error and would not be aware of the redirection (see e.g., Abstract).

Moreover, the Applicant’s fictitious domain name and real domain name are both associated with the device. In contrast, neither Choudry’s virtual subdomain names and domain names are associated with the device (User’s Browser Machine) but both are associated to information on the web which is requested by the device (User’s Browser Machine).

In view of the above, Applicant respectfully submits that Claim 42 is patentable.

c) Dependent claim 48

Applicants’ claim 48 recites:

both a fictitious domain name and a real domain name are stored in the device and wherein the device first transmits in the request message the real domain name to the address server and if, in response, the device receives a negative acknowledgement because no data record was associated with the real domain name, the device thereafter sends in the request message the fictitious domain name, thereby increasing the probability that the IP address of a particular parameter server will be sent to the device.

Claim 48 includes limitations similar to claim 42. In view of the arguments for claim 42, Applicant respectfully submits that claim 48 is patentable.

Conclusion

For the foregoing reasons, it is respectfully submitted that the rejections set forth in the outstanding Office Action are inapplicable to the present claims. The honorable Board is therefore respectfully requested to reverse the rejection of the Examiner and to remand the application to the Examiner with instructions to allow the pending claims. Please grant any extensions of time required to enter this paper. Please charge any appropriate fees due in connection with this paper or credit any overpayments to Deposit Acct. No. 19-2179.

Respectfully submitted,

Dated:

July 23, 2009

By:

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VIII. Claims Appendix

1.-16. (canceled)

17. A method for configuring a device in a data network, the data network comprising an address server, one or more devices requiring configuration, and one or more parameter servers, comprising:

storing a domain name for a device in the device;

storing in an address server on the data network a data record comprising an IP address of a particular parameter server of the one or more parameter servers, wherein the particular parameter server is associated with the domain name;

transmitting a request message from the device to the address server, wherein the request message includes the domain name;

ascertaining by the address server the data record associated with the domain name in the received message;

receiving a response message from the address server by the device, the response message comprising the IP address of the particular parameter server associated with the domain name from the data record;

setting up a connection to the particular parameter server by the device, the device using the IP address of the particular parameter server extracted from the response message to set up the connection; and

receiving parameters by the device from the particular parameter server, wherein the parameters are used to configure the device.

18. The method as claimed in patent claim 17, wherein the data network is a voice data network in which voice information is sent in data packets on the basis of Internet protocol.

19. (canceled)

20. The method as claimed in patent claim 17, wherein
the IP address of a particular parameter server is stored in a domain name system server
as the address server in a text field of the data record associated to the domain name, and
wherein the text field is sent to the device in the response.

21.-25. (canceled)

26. A method for configuring a device in a data network, the data network comprising
an address server, one or more devices requiring configuration, and one or more parameter
servers, the method comprising:

storing a domain name for a device in the device;

storing in an address server on the data network a data record comprising an IP address of
a particular parameter server of the one or more parameter servers, wherein the particular
parameter server is associated with the domain name;

transmitting a first request message to the addressing server by the device, the first
request message comprising the domain name;

ascertaining by the address server the data record associated with the domain name in the
received message;

transmitting the IP address of the particular parameter server to the device by the
addressing server in response to a receipt of the first request message,

wherein the device uses the IP address to set up a connection to the particular parameter
server, and

wherein the particular parameter server uses this connection to transmit to the device
parameters which are used to configure the device.

27. The method as claimed in patent claim 26, wherein the IP address related to the
particular parameter server associated with the device is stored in a text field which belongs to
the data record which belongs to the domain name associated with this device, and wherein the
text field is sent to the device as the response.

28. The method as claimed in patent claim 26, wherein the domain name is entered and stored in the device by a user or an administrator.

29. (canceled)

30. An arrangement for configuring a device in a data network, the data network comprising an address server, one or more devices requiring configuration, and one or more parameter servers, the device having a memory, the arrangement comprising:

an addressing server for converting between a domain name of a device and an Internet protocol (IP) address of a particular parameter server comprising the parameters to configure the device;

wherein the device, the addressing server, and the parameter server are connected via the data network, wherein

the device is designed to:

store a fully-qualified domain name associated with the device, and

transmit a request message to the addressing server, said request message comprising the fully-qualified domain name stored in the device, wherein

the addressing server is designed to:

use the fully-qualified domain name transmitted by the device to look up a text field associated with the transmitted domain name, the text field having address information of the particular parameter server, the address information including a port number,

form a response message comprising the looked address information of the particular parameter server assigned to the device, the response message transmitted to the device in response to the request message,

wherein the device is further designed to connect to the particular parameter server based on the response message, and

wherein the particular parameter server is adapted to send parameters to the device.

31. The arrangement as claimed in patent claim 30, wherein the data network is a voice data network in which voice information is sent in data packets on the basis of an Internet protocol.

32. (canceled)

33. The arrangement as claimed in patent claim 30, wherein the addressing server is a domain name system server.

34. The arrangement as claimed in patent claim 33, further comprising:
a DHCP server connected to the device via the data network and designed to send the domain name to the device using a DHCP method after said device has been started up, the domain name being that domain name which is used by the device in the request message.

35. The arrangement as claimed in patent claim 34, wherein the device is assigned to a domain in the data network, and the domain name sent in the request message is a name of this domain.

36. The arrangement as claimed in patent claim 30, wherein in the addressing server is stored the data record with a fictitious domain name which does not belong to a real domain, and wherein the fictitious domain name is simultaneously stored as domain name in the memory of devices in which no domain name for the real domain associated therewith is stored.

37. The method as claimed in patent claim 17, wherein the stored domain name is a fully-qualified domain name.

38. The method as claimed in patent claim 17, wherein the domain name is a fictitious domain name which does not belong to a real domain.

39. The method as claimed in patent claim 38, wherein both a real domain name and a fictitious domain name are stored in the device.

40. The method as claimed in patent claim 18, wherein at least one of the parameters received from the parameter server pertains to a transmission of the voice information.

41. The method as claimed in patent claim 26, wherein the stored domain name is a fictitious domain name which does not belong to a real domain.

42. The method as claimed in patent claim 41 , further comprising
storing, in the device, a real domain name with which the device is associated;
prior to transmitting the first request message:

transmitting a second request message to the addressing server, the second request message comprising the real domain name; and

receiving a negative acknowledgement by the device from the addressing server when address information for the parameter server cannot be ascertained in the domain name system server based on the real domain name transmitted in the second request message,

wherein the transmission of the first request message with the fictitious domain name to the addressing server is in response to the receipt of the negative acknowledgement message.

43. The method as claimed in patent claim 42, wherein the real domain name is a fully-qualified domain name.

44. The method as claimed in patent claim 26, wherein the stored domain name is a fully-qualified domain name.

45-47 (cancelled).

48. The method as claimed in patent claim 17 wherein both a fictitious domain name and a real domain name are stored in the device and wherein the device first transmits in the request message the real domain name to the address server and if, in response, the device receives a negative acknowledgement because no data record was associated with the real domain name, the device thereafter sends in the request message the fictitious domain name, thereby increasing the probability that the IP address of a particular parameter server will be sent to the device.

49. The method as claimed in patent claim 17 wherein a fictitious domain name comprising the generally known domain name of the device is stored by the manufacturer in the device and wherein the fictitious domain name is also stored in the address server and associated with a particular parameter server.

50. The method of claim 49 wherein a real domain name is stored in the device in addition to the fictitious domain name, and wherein the device first transmits in the request message the real domain name to the address server and if, in response, the device receives a negative acknowledgement because no data record was associated with the real domain name, the device thereafter sends in the request message the fictitious domain name, thereby increasing the probability that the IP address of a particular parameter server will be sent to the device.

IX. Evidence Appendix

The following affidavit, submitted on November 29, 2007, was considered by the Examiner on March 21, 2008.

SIEMENS

PATENT
Attorney Docket No. 2003P00251WOUS

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

Inventor:	Dr. C. Scheering)	
)	Group Art Unit: 2154
Serial No.:	10/529,405)	
)	Examiner: J. Park
Filed:	March 29, 2005)	
Title	METHOD AND ARRANGEMENT FOR CONFIGURING A DEVICE IN A DATA NETWORK		

Commissioner For Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Serial No. 10/529,405
Atty. Doc. No. 2003P00251WOUS

Sir:

DECLARATION OF DR. CHRISTIAN SCHEERING UNDER 37 CFR 1.132

1. I, Dr. Christian Scheering, a citizen of the Germany, hereby declare and state as follows:

2. I have been continuously employed by Miele & Cie. KG, since February 1, 2007. I primarily work in the area of software development for household appliance. Prior to this I was continuously employed by Siemens Aktiengesellschaft for 6 years, in which I primarily worked in the area of telecommunications, in particular I did software development for voice and data systems.

3. I received a Dipl.-Ing. degree in Electronics in 1991 from University of Applied Science of Bielefeld/Germany, a Masters of Science degree in Computer Science (Dipl.-Inform.) in 1995 from the University of Bielefeld/Germany and Doctoral degree (Dr.-Ing.) in Computer Science in 2000 from the University of Bielefeld/Germany.

4. I understand that the USPTO Examiner has rejected certain claims in the above-identified application on the basis that those claims are obvious by the teaching of Reichmeyer et al. (USPN 6,286,038) in view of Choudhry (USPN6,44,602), and Skemer et al.(USPN 6,570,849). I hereby submit that those skilled in the art, to include myself, understand the terms "domain name", "fully qualified domain name", "IP address", and "MAC address" as follows:

5. A "domain name" is an alphanumeric text address. Text may also be referred to as a string.

6. A fully qualified domain name is an unambiguous domain name in a alphanumeric format of protocol://host.subdomain.top-level-domain. The top-level domain and denotes the national state (country) associated with the domain name, such as "us" is the top-level-domain for the United States. The subdomain (also known a second-level domain) qualifies the top-level domain. For example, the subdomain may be associated with a server within the top-level domain specified. The host qualifies the subdomain. The host may be, for example, www (world wide web) or a specific device. The protocol is a protocol associated with domain name such as a communication protocol. For example HTTP (Hypertext Transfer Protocol) or ADP (Auto Discovery Protocol) may be used for the protocol.

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7. Internet Protocol (IP) address is a 32 or 128 bit numeric address associated with a layer 3 network protocol.

8. Media Access Control (MAC) address is 48 bit numeric address associated with a layer 2 network protocol.

9. Based on the above, a domain name would not be considered by those skilled in the art as an IP address or a MAC address. Likewise, a fully qualified domain name would not be considered by those skilled in the art as an IP address or a MAC address. Additionally, an IP address would not be considered by those skilled in the art as a MAC address.

10. All statements made herein of my own knowledge are true, and all statements made of information and belief are believed true. I acknowledge that willful false statements and the like are punishable by fine, imprisonment or both, and that such willful false statements may jeopardize the validity of the application or any patent issuing thereon.



Dated: November, 27th, 2007

By: _____

Dr. Christian Scheering

X. Related Proceedings Appendix

None